

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRIAN KEMP, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**[PROPOSED] ORDER GRANTING COALITION PLAINTIFFS’
EXPEDITED MOTION FOR LIMITED RELIEF
FROM PROTECTIVE ORDER (DOC. 477)**

This matter is before the Court on the Coalition Plaintiffs’ Expedited Motion for Limited Relief from Protective Order (Doc. ____).

Upon considering the motion and supporting authorities and any additional briefings, as well as the entire record in this case, the Court finds that good cause exists to grant the Motion.

The Court accordingly GRANTS the motion.

Coalition Plaintiffs are hereby GRANTED LEAVE to designate Marilyn Marks as an “expert and consultant” pursuant to Paragraph 5(b)(ii) of the Protective Order, (Doc. 477, at 10), with respect to all AEO-designated Coffee

County-related ¹ discovery documents including AEO-designated deposition testimony.

SO ORDERED this ____ day of _____, 2022.

Amy Totenberg
United States District Court Judge

¹ This Order uses the term “Coffee County related discovery” to include discovery related to the voting system breach and related security issues in the aftermath of the November 2020 election in Coffee County, Georgia, and similar attempts at unauthorized access of the voting system in other Georgia counties.

Respectfully submitted this 6th day of October, 2022.

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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/Robert A. McGuire, III
Robert A. McGuire, III

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CERTIFICATE OF SERVICE

I hereby certify that on October 6, 2022, I served a copy of the foregoing upon counsel for the Defendants via CM/ECF.

/s/Robert A. McGuire, III
Robert A. McGuire, III